

EXHIBIT “A”

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
MARTHA M. SMITH-GREY,

Plaintiff,

-against-

JUSTIN P. WILLIAMS and REDLINE TOWING, INC,

Defendants.
-----X

Index no. 27363/2018E

**AMENDED
VERIFIED COMPLAINT**

Plaintiff, by his attorney, LAW OFFICE OF EVANS D. PRIESTON, P.C., complaining of the defendant, alleges the following, as and for his complaint:

1. At all relevant times, plaintiff MARTHA M. SMITH-GREY resided in the County of Bronx, City and State of New York.
2. At all relevant times, defendant JUSTIN P. WILLIAMS resided in the City of Kunkletown, State of Pennsylvania.
3. At all relevant times, defendant REDLINE TOWING, INC was a foreign business corporation, having a place of business at 347 Main Street, Dickson City, PA 18519.
4. On May 6, 2018, defendant JUSTIN P. WILLIAMS was the operator of the 2015 motor vehicle bearing Pennsylvania Registration Number AG24620.
5. On May 6, 2018, defendant JUSTIN P. WILLIAMS was lessor of the 2015 motor vehicle bearing Pennsylvania Registration Number AG24620.
6. On May 6, 2018, defendant JUSTIN P. WILLIAMS maintained the 2015 motor vehicle bearing Pennsylvania Registration Number AG24620.
7. On May 6, 2018, defendant JUSTIN P. WILLIAMS controlled the 2015 motor vehicle bearing Pennsylvania Registration Number AG24620.

8. On May 6, 2018, defendant JUSTIN P. WILLIAMS managed the 2015 motor vehicle bearing Pennsylvania Registration Number AG24620.

9. On May 6, 2018, defendant REDLINE TOWING, INC was the owner of the 2015 motor vehicle bearing Pennsylvania Registration Number AG24620.

10. On May 6, 2018, defendant REDLINE TOWING, INC was the lessee of 2015 motor vehicle bearing Pennsylvania Registration Number AG24620.

11. On May 6, 2018, defendant REDLINE TOWING, INC maintained the 2015 motor vehicle bearing Pennsylvania Registration Number AG24620.

12. On May 6, 2018, defendant REDLINE TOWING, INC controlled the 2015 motor vehicle bearing Pennsylvania Registration Number AG24620.

13. On May 6, 2018, defendant REDLINE TOWING, INC managed the 2015 motor vehicle bearing Pennsylvania Registration Number AG24620.

14. On May 6, 2018, plaintiff a lawful passenger in the 2012 motor vehicle bearing New York Registration Number HCD3449.

15. At all relevant times, I-380, in the State of Pennsylvania, were public streets in common use of the residents of the City and State of Pennsylvania and others.

16. At all relevant times, defendants were solely responsible for the proper and prudent ownership, operation, management, maintenance, and control of their vehicle.

17. On May 6, 2018, the vehicle owned by defendant REDLINE TOWING, INC and operated by defendant JUSTIN P. WILLIAMS struck the vehicle, plaintiff was in as a lawful passenger, at the aforesaid location.

18. The aforesaid occurrence was caused wholly and solely by reason of the carelessness, recklessness and negligence of defendant in the ownership, operation,

maintenance, management, and control of her vehicle, without any negligence on the part of plaintiff contributing thereto.

19. As a result of the aforesaid occurrence, plaintiff was rendered sick, sore, lame, and disabled and have remained so since said occurrence. He sustained nervous shock and continue to suffer mental anguish and great physical pain. He will be compelled to undergo medical aid, treatment, and attention and to expend money and incur obligations for physician's services, medical and hospital expenses for the care and treatment of his injuries; and upon information and belief, he will be compelled to expend additional sums of money and incur further obligations in the future for additional physician's services, medical and hospital expenses for the further care and treatment of his injuries. He has been incapacitated from attending to her usual duties, functions, occupations, vacations and avocations, and in other ways he has damages, and upon information and belief, may be so incapacitated in the future and will suffer pecuniary losses.

20. Plaintiff sustained serious injuries as defined in §§ 5102 and 5104 of the Insurance Law of the State of New York.

21. Upon information and belief, this action falls within one or more of the exceptions set forth in CPLR 1601.

22. By reason thereof, plaintiff has been damaged in an amount greater than the jurisdictional limits of the lower Courts of the State of New York.

WHEREFORE, plaintiff demands judgment against defendants, and each of them, jointly and severally, in an amount greater than the jurisdictional limits of the lower Court of the State of New York, together with costs and disbursements.

Dated: Long Island City, NY
June 26, 2018

Yours, etc.



Evans D. Prieston, Esq.
LAW OFFICE OF EVANS D. PRIESTON, P.C.
Attorney for Plaintiffs
47-40 21st Street, 10th Fl.
Long Island City, NY 11101
(718) 424-2444

INDIVIDUAL VERIFICATION

STATE OF NEW YORK)

)ss.:

COUNTY OF QUEENS)

I, Martha Smith-Grey am the Plaintiff in the within action. I have read the foregoing Complaint and know the contents thereof. The contents are true to my own knowledge except as to matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

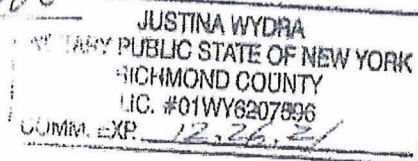
Martha Smith-Grey
Plaintiff

Sworn to before me this

26 day of June, 2018

J. M.

Notary Public



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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
MARTHA M. SMITH-GREY,

Plaintiff,

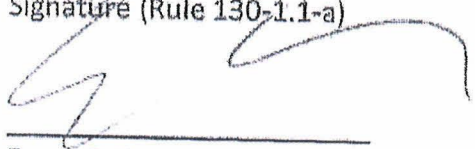
-against-

JUSTIN P. WILLIAMS and REDLINE TOWING, INC.,

Defendants.
-----X

AMENDED SUMMONS and VERIFIED COMPLAINT

Signature (Rule 130-1.1-a)



Evans D. Prieston

LAW OFFICE OF EVANS D PRIESTON, P.C.
Attorney for Plaintiff
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27363/2018E

MARTHA SMITH - v. - JUSTIN P. WILLIAMS et al

Assigned Judge: None Recorded

Documents Received on 06/26/2018 01:00 PM

Doc #	Document Type	Motion #
2	SUMMONS (PRE RJI) (AMENDED) Does not contain an SSN or CPI as defined in 202.5(e) or 206.5(e)	
3	COMPLAINT (AMENDED) Does not contain an SSN or CPI as defined in 202.5(e) or 206.5(e)	

Filing User

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Fax #:			

E-mail Notifications

An e-mail notification regarding this filing has been sent to the following address(es) on 06/26/2018 01:00 PM:

PRIESTON, EVANS D. - evansdplaw@gmail.com

NOTE: If submitting a working copy of this filing to the court, you must include as a notification page firmly affixed thereto a copy of this Confirmation Notice.

Hon. Luis M. Diaz, Bronx County Clerk

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